

SP-12844-M
application

DELPHI

DEPT. OF TRANSPORTATION
DOCKETS

4 June 2008

2008 JUL 22 A 11: 51

Associate Administrator for Hazardous
Materials Safety
Attention: Special Permits, PHH-31
Pipeline and Hazardous
Materials Safety Administration,
U.S. Department of Transportation, East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

Email: Specialpermits@dot.gov

Subject: Change to Special Permit DOT-SP 12844

Delphi Corporation, 250 Northwoods Boulevard, POBox 5051, Vandalia, OH 45377-5051. Telephone number (937) 356-2225, fax (937) 356-2466, e-mail allen.r.starner@delphi.com, respectfully requests that US DOT Exemption DOT-SP 12844 be changed in two areas.

1. We request the extension of the maximum duration of the shift specified in 178.65(f) (3) be extended beyond 10 hours at the discretion of our independent inspectors.
2. In 49 CFR 178.65 (f)(2)(iii), it states, "A failure is other than in the sidewall of a cylinder longitudinal with its long axis;" We request that we be allowed to have failures in our endcaps in units that are built specifically for our hydroburst testing. We propose to have a lower limit of 2.5 times the service pressure. The failure is a ductile failure in parent material. The units have failed at a minimum pressure of 27,000 psi. Our maximum fill at this point is 9,250 psi.

Attached, you will find two photographs of one of our hydroburst samples, showing a typical failure mode. Figure 1 shows the area where the unit ductily failed and then peeled back.

Figure 2 shows a side view of the failure.

We certify that all data made in our original application remains accurate and complete.

Delphi has shipped an average of at least 2 million (2,000,000) inflators a year since receiving this exemption. We certify that Delphi has had no incidents/accidents in connection with this exemption; and, we certify there has been no loss of contents during transport, including loss by venting.

Thank you in advance for your help and consideration in this important matter. If you have any questions, please don't hesitate to contact the undersigned at (937) 356-2249, Fax (937) 356-2249, or via e-mail at bryan.t.waid@delphi.com.

Sincerely,

Bryan T. Waid
Regulatory Engineer
Delphi Corporation

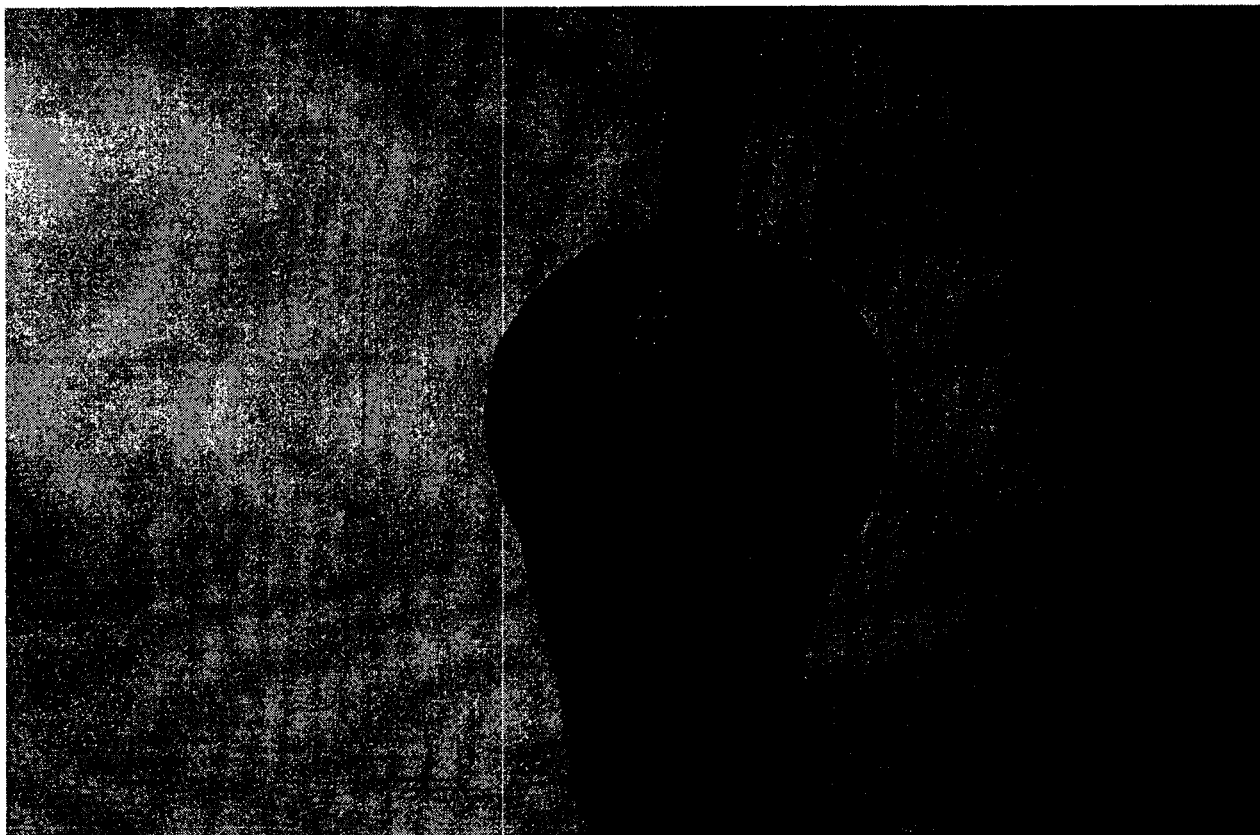


Figure 1. Failure Zone.



Figure 2. Side View.